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U.S. DISTRICT COURT
MID. DIST. TENN.

IN THE
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

GEORGE C. ALEXANDER, JR.,)
)
Plaintiff,)
)
v.)
)
NEVADA STATE BANK,)
)
Defendant,)
)
AND)
)
INTEGRATED PAYMENT SYSTEMS, INC.)
)
Defendant.)
_____/

Case No: _____

COMPLAINT

COMES NOW, GEORGE C. ALEXANDER, JR. ("ALEXANDER") of Brentwood, Tennessee, representing himself in propria persona and in forma pauperis and files his complaint against Nevada State Bank ("Bank" or "the Bank") of Las Vegas Nevada and Integrated Payment Systems, Inc. ("IPS"), of Englewood, Colorado. Alexander would show the court how he was defrauded and denied payment of certain interstate financial instruments and requests damages as detailed herein. Alexander request repayment of the exact amount of the instruments of which he was defrauded and additional funds necessary to cover nominal, compensatory, and punitive damages. Alexander has attached hereto his application to proceed on an in forma pauperis basis along with a signed financial statement.

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JURISDICTION

This is a matter concerning interstate commerce. Under 28 U.S.C. Section 1331, the Code reads, "The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, and treaties of the United States.

CHORONOLOGICAL EVENTS

On or before February 17, 2004, Alexander requested Nevada State Bank to close two business accounts that he had opened with the bank in 2003. The first account was numbered 022074389 and was jointly titled under the business name of Frontrunner, Inc. as well as under George Carlton Alexander, Jr. (See Exhibit 1). The second account was numbered 022074397 and was titled jointly under the name of Magnum International Services, Inc. as well as under George Carlton Alexander, Jr. (See Exhibit 2).

Alexander began serving a 117 month prison sentence on February 17, 2004 and was not released until December 22, 2011. Upon his return home, Alexander began searching through old files and inadvertently discovered the two cashier's checks written on the above noted accounts (See Exhibits 3 and 4). In examining the checks Alexander noticed that his wife had endorsed both checks in an attempt to deposit them in her checking account (See Exhibits 5 and 6). Alexander asked his wife about these two checks and she told him that she had attempted to endorse the checks but her bank would not allow her to deposit the checks in her account because neither check was written to her. Therefore, she simply put the checks away and since there was no further reminder of the checks, she forgot about them.

Upon receiving this information, Alexander called Nevada State Bank and after a series of discussions was told that most likely since the checks had not been cashed, that the State of Nevada had collected the funds, after a three year period, as escheatment funds. Alexander spoke with both

the branch manager, Joe Laiacona, and the bank's research department investigator Steve Trupe. Both men confirmed that even though the checks were valid, the actual check company, IPS, was really responsible for the turnover of funds on the instruments to the State of Nevada.

Alexander called IPS, whose phone number was listed both on-line and with Directory assistance as (303) 488-8000. The number was disconnected. Additionally there were numerous addresses for the business, all in the Denver, Colorado area, none of which were open for business. Alexander has not been able to reach IPS or any of its staff after numerous attempts.

Due to the refusal by Nevada State Bank to either show proof that the instruments (cashier's checks) were awarded to the State of Nevada, or to show proof that the bank at least attempted to communicate (by certified letter or otherwise) to Alexander or his wife to advise him of the fact that the checks remained un-cashed, and due to the bank's unwillingness to pay for either check, Alexander has no alternative but to bring this action to attempt to procure the money that he is owed as well as other damages that this court should award Alexander.

ACTIONS BY BANK OF BAD FAITH

The Bank has an obligation to Alexander to either pay the amount owed on the checks or to show where the checks were claimed by the State of Nevada under the escheatment laws. However, if the latter is the case, the bank should know, or should have known, that notice of the checks non-cashed status should have been forwarded to Alexander, and or his wife. The Bank has not and cannot provide proof of either; therefore its actions are egregious and committed in bad faith.

Alexander, being a pro se litigant and without only minimal access to United States Code, Case Law, and other legal information, requests that the Court take his pleading into consideration and make applicable any law that would pertain to this matter, which Alexander has no ability to quote as Constitutional Grounds or to support his claim. Alexander believes that in a matter of this

nature the Court has the right sua sponte to insert the applicable law to insure that justice is carried out.

PRAYER FOR RELIEF

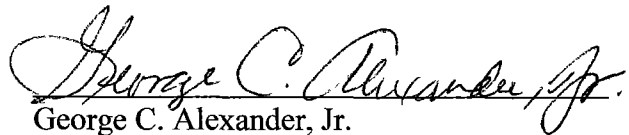
Alexander therefore requests that the bank pay Alexander the following:

1. The total amount of both checks (\$1,622.88), which Alexander can either sign and return to the bank, or deposit in his own checking account with the bank instructing Alexander's bank to allow him to deposit.
2. Nominal Expenses of \$5,000 for the numerous hours that Alexander has spent researching this matter and attempting to negotiate with the bank and in attempting to locate anyone with IPS who can verify the status of the financial instruments in question in this matter.
3. Punitive Damages or treble damages should be awarded to Alexander to be paid by the bank to teach the bank that it is much less expensive to deal in good faith with customers or former customers that to attempt to evade the issue to add a miniscule amount to the company's bottom line. Treble damages should equal the amount of the checks plus \$5,000.00 times 3 (\$1,622.88 + \$5,000.00 = 6622.88 x 3 = \$19,868.64). The total for all three claims would equal \$26,491.52.

WHEREFORE, PREMISES CONSIDERED AND FOR GOOD CAUSE SHOWN, Alexander prays that the Court grant him the relief noted above in Items 1 – 3, or in the alternative grant any other relief that Alexander might be entitled to in this Court's wisdom.

Respectfully submitted,89

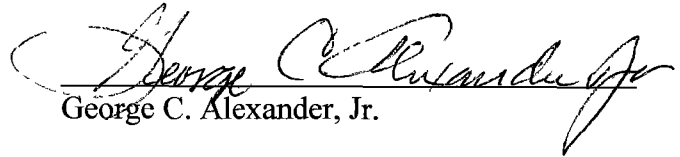
2-4-11
DATE:


George C. Alexander, Jr.
Plaintiff, in propria persona
755 Fox Ridge Drive
Brentwood, Tennessee 37027
(615) 419-1250

CERTIFICATE OF SERVICE

I hereby certify that I mailed one copy of this Complaint via first class mail with first class postage prepaid and affixed thereto to the parties shown below on the date noted infra:

2-4-11
DATE:


George C. Alexander, Jr.

General Counsel
Nevada State Bank
P.O. Box 990
Las Vegas, Nevada 89125-0990

FRONTRUNNER INC
GEORGE CARLTON ALEXANDER JR
2801 S VALLEY VIEW BLVD STE 1
LAS VEGAS NV 89102-0116

389

SUMMARY PROFILE	PRODUCT DESCRIPTION	ACCOUNT NUMBER	CHECKING/SAVINGS BALANCE	LOANS/CREDIT BALANCE
	ENTERPRISE CHECKING	389	875.88	
		TOTAL	875.88	TOTAL .00

CHECKING ACCOUNT	PREVIOUS BALANCE	DEPOSITS/CREDITS NO	AMOUNT	CHECKS NO	AMOUNT	OTHER CHARGES NO	AMOUNT	ENDING BALANCE
	3,882.88	0	.00	1	3,000.00	1	7.00	875.88

DEPOSITS

*** NO TRANSACTION ACTIVITY ***

CHECKS PROCESSED

DATE...CHECK NO.....	AMOUNT	DATE...CHECK NO.....	AMOUNT	DATE...CHECK NO.....	AMOUNT
11/04 17500	3,000.00				

OTHER CHARGES

11/29 7.00 MONTHLY MAINTENANCE FEE

DAILY BALANCE

11/04 882.88 11/29 875.88

GET A HOLD OF YOUR DREAMS WITH A LOW RATE LOAN FROM NEVADA STATE BANK. CALL 399-LOAN (LAS VEGAS CALLING AREA), 851-8811 (RENO CALLING AREA), OR 1-800-789-4671 (ALL OTHER AREAS) TO APPLY TODAY!

Exhibit 1

NSB NEVADA STATE BANK Member FDIC

STATEMENT DATE
NOVEMBER 29, 2002
PAGE 1

|||||.....|||||.....|||||.....|||||.....
MAGNUN INTERNATIONAL SERVICES INC
GEORGE CARLTON ALEXANDER JR
2801 S VALLEY VIEW BLVD
LAS VEGAS NV 89102-0116

0

~~397~~ 397

SUMMARY PROFILE	PRODUCT DESCRIPTION	ACCOUNT NUMBER	CHECKING/SAVINGS	BALANCE	LOANS/CREDIT	BALANCE
	ENTERPRISE CHECKING	397 397		979.00		
			TOTAL	979.00	TOTAL	.0

CHECKING ACCOUNT	PREVIOUS BALANCE	DEPOSITS/CREDITS.. NO	AMOUNT	CHECKS..... NO	AMOUNT	OTHER CHARGES... NO	AMOUNT	ENDING BALANCE
	986.00	0	.00	0	.00	1	7.00	979.00

DEPOSITS

*** NO TRANSACTION ACTIVITY ***

CHECKS PROCESSED

DATE...CHECK NO.....AMOUNT	DATE...CHECK NO.....AMOUNT	DATE...CHECK NO....AMOUNT
----------------------------	----------------------------	---------------------------

*** NO CHECK ACTIVITY ***

OTHER CHARGES

11/29	7.00	MONTHLY MAINTENANCE FEE
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DAILY BALANCE

11/29	979.00
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GET A HOLD OF YOUR DREAMS WITH A LOW RATE LOAN FROM NEVADA STATE BANK. CALL 399-LOAN (LAS VEGAS CALLING AREA), 851-8811 (RENO CALLING AREA), OR 1-800-789-4671 (ALL OTHER AREAS) TO APPLY TODAY!

Exhibit 2

BACK OF THIS DOCUMENT HAS AN ARTIFICIAL WATERMARK PRINTED IN A SPECIAL WHITE INK

NEVADA STATE BANK
LAS VEGAS NEVADA 89125 0990
POB 05 7124

OFFICIAL CHECK

HOLD THE DOCUMENT AT A SMALL ANGLE TO SEE THIS SECURITY FEATURE

457828140 90-4314 1220

DATE: February 07, 2014

OFFICE

PURCHASED BY

Y TO THE ORDER OF

NEVADA STATE BANK #0318 **863005000000**

DRAWER NEVADA STATE BANK

AUTHORIZED SIGNATURE

by Integrated Payment Systems Inc, Englewood Colorado
at Bank, Los Angeles CA

⑈995761⑈ ⑆122043149⑆ 68004578281406⑈

VARIABLE TONE BACKGROUND AREA OF THIS DOCUMENT CHANGES COLOR GRADUALLY AND SMOOTHLY FROM DARKER TONES AT BOTH TOP AND BOTTOM TO THE LIGHTEST TONE IN THE MIDDLE.

Exhibit 4

THE BACK OF THIS DOCUMENT HAS AN ARTIFICIAL WATERMARK PRINTED IN A SPECIAL WHITE INK. **OFFICIAL CHECK** HOLD THE DOCUMENT AT A SMALL ANGLE TO SEE THIS SECURITY FEATURE.

NSB NEVADA STATE BANK 457828141 90-4314 1220
LAS VEGAS, NEVADA 89125-0990

1003 05 7420 DATE: 7/26/04

OFFICE

PAY TO THE ORDER OF PURCHASED BY

NEVADA STATE BANK #0318 759 DOLS 88015

DRAWER NEVADA STATE BANK

AUTHORIZED SIGNATURE

Issued by Integrated Payment Systems Inc., Englewood, Colorado
Imperial Bank, Los Angeles, CA

⑈995761⑈ ⑆122043149⑆ 68004578281415⑈

THE VARIABLE TONE BACKGROUND AREA OF THIS DOCUMENT CHANGES COLOR GRADUALLY AND SMOOTHLY FROM DARKER TONES AT BOTH TOP AND BOTTOM TO THE LIGHTEST TONE IN THE MIDDLE.

ENDORSE CHECK HERE

X for Deposit only MP

~~XXXXXXXXXX~~

DO NOT WRITE / SIGN / STAMP BELOW THIS LINE

DEPOSITORY BANK ENDORSEMENT

FOR INFORMATION CONCERNING THIS INSTRUMENT

CONTACT

INTEGRATED PAYMENT SYSTEMS, INC.

1-800-223-7520

X for Deposit only MP
~~000000~~

DO NOT WRITE / SIGN / STAMP BELOW THIS LINE

DEPOSITORY BANK ENDORSEMENT

FOR INFORMATION CONCERNING THIS INSTRUMENT

CONTACT

INTEGRATED PAYMENT SYSTEMS INC

1 800-223-7520